EXHIBIT C

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February 3, 2021

<u>VIA EMAIL</u>

Jay Rapaport
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RE: *Singular Computing LLC v. Google LLC*
        <u>Case No.: 1:19-cv-12551-FDS (D. Mass.)</u>

Counsel,

Attached please find "hit" counts for custodial searches for both Singular and Intrinsix. As you can see, the counts are extraordinarily high for a company of Singular's size. Given Google's search strings it is not difficult to understand why. Rather than formulate searches narrowly tailored to specific issues in this case, Google instead appears to have tossed together a brainstorm of well over 200 individual and largely non-delimited terms.

As only the most egregious examples, these include the term *patent**, the inventor's name (*Bates*), the name of the producing party (*Singular*, Intrinsix*), and the name of the patentee's prosecution firm for over a decade (*Blueshift*). In other cases, it appears Google simply compiled a hodgepodge of names, nearly all having a tenuous connection, at best, to any issue in this case. *See, e.g.,* Singular Search Strings 8 and 9.

We recommend that Google drastically refine and reduce these search strings so that they are narrowly tailored to specific issues. Because Google has asked for well in excess of 200, resulting in tens of thousands of hits for a company that has largely employed a single individual over the past decade, it is difficult to say exactly where Google should begin cutting. Nevertheless, the search terms should be narrowly tailored to particular issues. See, e.g., "E-Discovery Model Order" http://www.cafc.uscourts.gov/images/stories/announcements/Ediscovery_Model_Order.pdf. Indiscriminate terms, such a producing company's name or its product, are inappropriate unless combined with narrowing search criteria that sufficiently reduce the risk of overproduction. *Id*.

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Furthermore, we cannot believe Google seriously thought it reasonable to request every email in Singular's custody containing the term *patent**, or that merely includes the last name of Singular's prosecution counsel (*Plotkin*), over a decade-plus during which Singular was in continuous worldwide patent prosecution. It is similarly hard to believe Google expected production from Intrinsix of every email containing the company's own name (*e.g., Intrinsix Search String 8).*

Rather, it seems Google's overreaching searches are intended to either (a) maximize the cost and effort to Singular in reviewing, privilege logging, and producing its email documents; or (b) to needlessly delay Singular's production of emails so as to justify Google's own delay in producing the emails Singular had already requested from Google.

As to the former, that conduct speaks for itself.

As to the latter, Singular will begin rolling production for those search strings that returned a reasonable number of hits immediately following a privilege screen. This includes Intrinsix Search Strings Nos. 1, 4-7, and 9 and Singular Search String 7. While we do not believe those search strings necessarily reasonable, there is no simply reason either party should not begin rolling production of any non-privileged emails as soon as possible. Indeed, nothing could be less efficient than both parties' waiting until every email had been reviewed by the producing party before producing a single email, which would result in an entirely unnecessary tsunami of document production to the receiving party with little time remaining for a meaningful review before fact discovery closes.

As such, if Google does not intend to begin rolling production of those emails it has already reviewed and cleared for production, please let us know as soon as possible, and provide your availability for a meet and confer to resolve this matter on Monday, February 8, 2021. If Google does intend to begin rolling productions immediately, please let us know when it expects to make its first production to Singular.

Please let us know if you have any questions and we look forward to receiving Google's revised search strings and its long-awaited email production.

Best regards,

/s/ Michael J. Ercolini

Michael J. Ercolini

	SINGULAR SEARCH STRING	HIT COUNT
Singular String 1	S1 OR S-1	2,218
Singular String 2	APE OR (approx* W/3 (process* OR comput*)) OR (approx* W/10 (precis* OR imprecis*)) OR "processing element*" OR PE	7,349
Singular String 3	Analog* OR *Deterministic OR systolic*	1956
Singular String 4	Google* OR TPU* or Tensor*	6,497
Singular String 5	bfloat* OR BF* OR (Half W/3 float*) OR ((FP OR Float*) W/5 library) OR exponent* OR mantissa*	1355
Singular String 6	FPGA* or ASIC* or GPU* or DSP*	7958
Singular String 7	((table* OR conver*) W/10 (log* OR LNS OR *bit OR bit*)) OR "input signal*" OR ((round! OR trunc!) W/10 input*)	417
Singular String 8	Sandia OR DARPA OR BAE OR baesystems OR ONR OR Navy OR Intrinsix OR MOSIS OR USC OR GlobalFoundries OR CRA or "Charles River" OR Apple* OR Fujitsu* OR Takeshi OR Horie OR Bedichek OR Cadence* OR CAVE OR Roy OR CSAIL OR MIT* OR Media Lab OR NVidia OR Carnegie Mellon OR CMU* OR Kanade OR Hammerstrom OR Blueshift* OR Plotkin OR Struever OR Colwell OR emulator* OR (dep* /2 defense) OR DOD* OR (dep* /2 energy) OR DOE* OR "nuclear security" OR NSA OR NVESD OR army OR "night vision" OR NIWCP OR Naval OR "warfare pacific" OR SPRITE OR spectral OR SIGINT OR WAAS OR "airborne sensor" OR "energy efficient signal classifier" OR MAD-HATTER	51,543
Singular String 9	Viredaz OR Ienne OR Tong OR Rutenbar OR Nagle OR Cray OR *T3D OR CF90TM OR CNAPS OR Baker OR SYNAPSE OR Ramacher OR Raab OR Wawrzynek OR Asanovic OR SPERT* OR Dockser OR (Annapolis Micro*) OR AMS OR Wildstar OR Wildforce OR Xilinx OR Splash OR Arnold OR Vertex* OR Virtex* OR DS112 OR LogiCore OR Qinetiq OR (float* /5 (core OR operat*)) OR Shirazi OR Walters OR Athanas OR Aty OR Azizi OR Hussein OR Ashour OR Mones OR Belanovic OR Leeser OR Sudha OR Prasanna OR Kamakoti OR (Texas Instrument*) OR *C32* OR GRAPE* OR Okumura OR Makino OR Ebisuzaki OR Fukushige OR Ito OR Sugimoto OR Hashimoto OR Tomida OR Miyakawa OR Hoefflinger OR Selzer OR Warkowski OR Yongsoon OR Barszcz OR Frantz OR Simar OR Gaffar OR VLSI OR Lopez OR Kuhn OR 286 OR i486 OR i860 OR Kinser OR Lindblad OR Kjosavik OR Kung OR Leiserson OR Leinhart OR McCartor OR OpenEXR OR OpenGL OR Paschke OR Moller OR Perlmutter OR Ramacher OR Rojas OR Zuse OR Z1 OR Z3 OR Rose OR Willoughby OR Sahin OR Kung OR 4,493,048 OR Cohen OR 5,442,577 OR Hawkins OR 5,666,071 OR MacMillan OR 5,689,677 OR Cloutier OR 5,892,962 OR Nelson OR 6,311,282 OR Levardo OR 6,600,222 OR Youngs OR *4760 OR Flynn OR *6164 OR Vollmer OR Strey OR VanDrunen OR Zhang OR Pal OR Patterson OR Hennessy OR "IEEE 754"	10,114
Singular String 10	Licens* OR collaborat* OR patent* OR (evaluat* /5 tech*) OR agreement*	14,703
Singular String 11	Dean OR Astro OR Teller OR Ng OR Quoc OR Obi OR Felton OR Tornabene OR Patterson OR Murphy OR Jouppi OR Boden OR Nan* OR Thrun OR Piponi OR (andrew /3 Ng) OR Spalink OR Mikanik OR Baluja	3,272
Singular String 12	Kent OR Arnold OR kjarnold OR Beal OR Stecyk OR Tenenbaum OR Boyd OR Struever OR dfaust OR Faust OR Shumikhin OR Varadarajan OR Liu OR Swetha OR Leo	10,718

	INTRINSIX SEARCH STRING	HIT COUNT
Intrinsix String 1	S1 OR S-1	208
Intrinsix String 2	Bates OR Singular*	8,054
Intrinsix String 3	APE OR (approx* W/3 (process* OR comput*)) OR (approx* W/10 (precis* OR imprecis*)) OR "processing element*"	837
Intrinsix String 4	Analog* OR *Deterministic OR systolic*	89
Intrinsix String 5	Google* OR TPU* or Tensor*	44
Intrinsix String 6	bfloat* OR BF* OR (Half W/3 float*) OR ((FP OR Float*) W/5 library) OR exponent* OR mantissa*	26
Intrinsix String 7	((table* OR conver*) W/10 (log* OR LNS OR *bit OR bit*)) OR "input signal*" OR ((round! OR trunc!) W/10 input*)	16
Intrinsix String 8	Sandia OR DARPA OR BAE OR baesystems OR ONR OR Navy OR Intrinsix OR MOSIS OR USC OR GlobalFoundries OR CRA or "Charles River" OR Apple* OR Fujitsu* OR Takeshi OR Horie OR Bedichek OR Cadence* OR CAVE OR Roy OR CSAIL OR MIT* OR Media Lab OR NVidia OR Carnegie Mellon OR CMU* OR Kanade OR Hammerstrom OR Blueshift* OR Plotkin OR Struever OR Colwell OR emulator* OR (dep* /2 defense) OR DOD* OR (dep* /2 energy) OR DOE* OR "nuclear security" OR NSA OR NVESD OR army OR "night vision" OR NIWCP OR Naval OR "warfare pacific" OR SPRITE OR spectral OR SIGINT OR WAAS OR "airborne sensor" OR "energy efficient signal classifier" OR MAD-HATTER	8056
Intrinsix String 9	Mustafa OR Ozgen OR Tenenbaum OR Boyd OR Struever OR Foley OR Senanayake OR Rawn OR dfaust OR Faust OR Shumikhin OR Varadarajan OR Liu OR Swetha OR Leo	212